and strongly believes that the once-amended Claims 1, 15, 25 and 39 and their corresponding dependent claims are allowable over the cited references.

Additional features were introduced to the independent claims in the Response to the First Office Action dated 07/03/01. However, in the current Office Action, these additional features do not seem fully considered. The Applicant respectfully believes that the current Office Action fails to establish a *prima facie* case of obviousness, and how the references do not, in fact, teach or suggest the claimed invention.

The Applicant deems that it is necessary to reiterate the distinctions between the claimed invention and the cited references Borgendale and Fuji Xerox.

First, the claimed invention is a method for generating a structured document from an unstructured document while Borgendale teaches a method of generating an unstructured document from a structured document, *two conflicting objectives*. Referring to Lines 16-19 of Page 3 in the pending application, a structured document is a markup language file and further illustrated in Figure 2A as an example. Referring to Lines 9-13 of Page 13 in the pending application, an unstructured document is a result from an authoring tool and further illustrated in 2C as an example. One of the major differences is that "the data sequence in the unstructured document is parsed into data elements associated with document elements defined in DTD for the structured document."(see lines17-20 on page 16).

With the above definitions, Borgendale shows that an structured document illustrated in Figure 8 is a markup language file (i.e. a structured document) from which an unstructured document is generated and shown in Figure 7, further described in lines 32-54 of Col. 10 therein. While the present invention recites that a structured document (e.g. Figure 2C) is generated from an unstructured document (e.g. Figure 2A).

One may argue that the "order" of the two processes, evidently opposite, is irrelevant. The Applicant wishes to point out that there is a fundamental issue here. An unstructured document can be generated as desired from a structured document because the structured document has all necessary "commands", similar to a source file (e.g. in HTML) received by a browser that can draw a display according to the

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commends in the source file. When an unstructured document, such as a PDF (a commonly used format on the web), is received, it is not trivial to simply generate a structured document (e.g. commands) from the PDF file because what is seen is the results of the "commands" that have been "executed" and the "commands" are no longer literally available. One of the objectives in the present invention is to create a set of "commands" in a structured document based on how objects (e.g. texts and graphs) are to be displayed in a future unstructured document.

Secondly, the Applicant wishes to review the Examiner's reasons to reject Claim 1, the once-amended Claim 1 recites:

> receiving a definition file including document type definitions (DTD);
> displaying a metafile along with the definition file, the metafile including a number of displayable objects being displayed and respective decoration attributes about each of the displayable objects;
> associating at least one of the definitions in the definition file with one of the displayable objects; and
> creating the structured document from the metafile in accordance with the at least one of the definitions being associated with the one of the displayable objects.

One element that seems to be misunderstood is "metafile". Lexicographically without altering the conventional meaning, a metafile is clearly defined in Lines 4 - 7 of page 18 in the specification. Specifically, it states that "A metafile, referring to either the unstructured document or a printed version thereof, typically contains many displayable objects". To illustrate a metafile, an exemplary metafile is provided in Figure 3B In which an object (e.g. 326, 340 or 344) shows a group of characters or words or a graphic representation. While, on page 3 of the Office Action, the Examiner states:

-a file including a number of objects indicative of "decorative" attributes, such as font, etc. (Borgendale Figures 19-21 – middle section in each figure; compare with claim 1 "... the metafile including a number of displayable objects", and " respective decoration attributes about each of the displayable objects").

The Applicant respectfully points out to the Examiner that the "file" being compared with the metafile of the pending application is what is called document construction module in Borgendale. As shown in the 1st line of the module in Figure 19, 20 or 21, the document construction module commands how a document shall be

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displayed. Clearly the document construction module, different from a metafile, is not used to be displayed to facilitate "associating at least one of the definitions in the definition file with one of the displayable objects in the metafile". If The Examiner insists that one or more document construction modules may be interpreted as a metafile in certain extend, the Applicant would challenge the Examiner to imagine what may look like if the middle portion of Figure 19, 20 or 21 was up for display. One is a set of commands and the other is a displayed document from which a set of commands is to be generated. The Applicant respectfully affirms that the document construction module in Borgendale has noting to do with the metafile in any respect.

While Fuji Xerox shows that a document is displayed together with a (document) structure thereof. The document is displayed as 41 and the structure is displayed as 42 in Figure 4. The structure shows how the document is structured. Figure 5 shows the expansion of the document in 41, so does the corresponding structure in 42. Given the above explanation of a metafile, none of the document or the structure could be possibly extended in any way to be a metafile.

Third, the once-amended Claim 1 recites "creating the structured document from the metafile in accordance with the at least one of the definitions being associated with the one of the displayable objects". As reasoned above, Borgendale does the opposite and could not create a structured document from a metafile.

The Applicant wishes the Examiner reconsiders the above explanations of the present invention and respectfully submits that that features recited in the once-amended Claim 1 are neither taught nor suggested in Borgendale and Fuji Xerox, either alone or in combination. In fact, in some respect, Borgendale teaches away from the features recited in the once-amended Claim 1 as one simply can not generate a structured document from an unstructured document without "associating at least one of the definitions in the definition file with one of the displayable objects in the metafile". Accordingly, the Applicant believes that Claim 1 in its present form and its dependent claims shall be allowable over the cited references.

Regarding Claim 15, the Applicant wishes to apply the above reasons to support the once-amended Claim 15. In addition, none of the cited references, teaches or

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suggest <u>forming a number of group objects, each of the group objects including one or more of the displayable objects</u>. Lines 40 - 46 on Column 8 of Borgendale, relied upon by the Examiner, are related to a document construction module. Given the reasons stated above, the document construction module is not for display and further contains no <u>displayable objects to be grouped</u>. Accordingly, the Applicant respectfully requests that the Examiner reconsider the rejection of Claim 15 and corresponding dependent claims 16- 24 in view of the foregoing stated arguments and distinctions between the once-amended Claim 15 and the cited references.

Independent Claims 25 and 39 are computer program product claims, mirroring the preceding method claims. Accordingly, the Examiner rejects the Claims 25 and 39 and the corresponding dependent claims 26 - 38 and 40 - 42 using the similar reasons. Hence, the Applicant respectfully requests that the Examiner reconsider the rejections of Claim 25 - 42 in view of the foregoing arguments.

In view of the above amendments and remarks, it is believed by the Applicant that the pending claims 1 - 42 shall be in condition for allowance over the cited references. Therefore, it is believed that the entire application is now in condition for allowance, early and favorable action is being respectfully solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplementary Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at (408)777-8873.

I hereby certify that this correspondence is being faxed to Mr. Examiner William L. Bashore at (703)308-6606,

on __11/6__, 2001.

Signed: _____

Dated this _6 th_ day of November, 2001

Joe Zheng
Reg. No.: 39,450

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